

DOCKET NO.: X07-HHD-CV-18-6090558-S	:	SUPERIOR COURT
	:	
WILLIAM & LAURIE PAETZOLD	:	COMPLEX LITIGATION
	:	
v.	:	JUDICIAL DISTRICT
	:	HARTFORD
METROPOLITAN DISTRICT	:	
COMMISSION	:	AT HARTFORD
	:	
	:	JULY 29, 2020

AFFIDAVIT OF SETH R. KLEIN IN SUPPORT OF MOTION FOR CONFIRMATION OF MODIFIED CLASS DEFINITION AND FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES AND FOR SETTLEMENT CLASS REPRESENTATIVE AWARDS

I, Seth R. Klein, hereby declare as follows:

1. I am an attorney with the law firm of Izard, Kindall & Raabe, LLP (“IKR”), and am competent to declare the matters stated herein.

2. IKR represents the named Plaintiffs and Settlement Class Representatives William Paetzold and Laurie Paetzold. I submit this declaration in support of (1) Plaintiffs’ Motion for Confirmation of Modified Class Definition and Final Approval of Class Action Settlement Modification of the Certified Class Definition and Motion for Approval of Class Action Settlement, and (2) Plaintiffs’ Motion for Award of Attorneys’ Fees, Costs and Expenses and for Settlement Class Representative Awards.

Course of the Litigation

3. On March 27, 2020, I previously filed the Affidavit of Seth R. Klein in Support of Motion for Preliminary Approval dated March 26, 2020 [Dkt. No. 179.00] (“Klein Prelim. App. Aff.”) setting forth the history of this litigation and attaching certain relevant documents. I hereby reaffirm the accuracy of, and adopt herein the entirety of, that prior affidavit.

Notice to the Settlement Class

4. In accord with the Preliminary Approval Order [Dkt. No. 177.86], the Parties worked with JND Legal Administration (“JND”) to provide the class with information about the case and proposed settlement. Details of the provision of Notice to the Settlement Class are set forth in the accompanying Declaration of Jennifer M. Keough, Chief Executive Officer at JND.

IKR’s Time, Lodestar and Expenses

5. This firm’s experience, as well the experience of the IKR attorneys involved in this litigation, is described in detail in the IKR Firm Resume attached hereto as Ex. 1.

6. As of July 29, 2020, IKR attorneys and staff have spent 984.25 hours prosecuting this case to date, including time devoted to investigating, drafting pleadings, engaging in discovery, reviewing documents, negotiating and finally settling this case. IKR’s aggregate lodestar is \$643,755.00, broken down as follows:

Attorney	Years of Practice	Rate	Hours	Lodestar
Robert A. Izard	37	\$ 925	49.50	45,787.50
Mark P. Kindall	32	\$ 850	110.75	94,137.50
Craig A. Raabe	32	\$ 850	292.75	248,837.50
Seth R. Klein	24	\$ 750	80.25	60,187.50
Douglas P. Needham	12	\$ 650	1.50	975.00
Christopher M. Barrett	9	\$550	189.75	104,362.50
Oren Faircloth	3.5	\$ 350	251.25	87,937.50
Eileen A. McGee	Paralegal	\$180	8.00	1,440.00
Jude Reid	Paralegal	\$ 180	.50	90.00
Total			984.25	\$643,755.00

7. The schedule shown in the preceding paragraph was prepared from contemporaneous daily time records regularly prepared and maintained by IKR, which are available at the request of the Court.

8. The hourly rates shown in paragraph 7 are the same as the regular current rates generally charged for services in non-contingent hourly rate billing matters. In addition, numerous courts throughout the country and in this state have accepted IKR's rates as the basis for lodestar calculations in other class actions in which we have served as counsel.

9. IKR has incurred a total of \$6,759.23 in unreimbursed expenses in connection with the prosecution of the Action as of July 29, 2020, broken down as follows:

Category	Amount
Court Fees	725.37
Mediation/Arbitration	2,625.00
Research/Discovery	2,161.68
Sheriff/Service Fees	133.00
Transcripts	957.87
Travel	120.27
Postage/Delivery	36.04
Total Expenses	\$6,759.23

10. The expenses shown in the preceding paragraph were actually incurred and paid over the course of the litigation. They were all paid by IKR, with no guarantee that they would ever be recovered except in the event that the litigation was successful and the Court approved

the reimbursement. I have reviewed these expenses and believe that they were both necessary and appropriate for the prosecution of the case.


Settlement Class Representatives William Paetzold and Laurie Paetzold

11. Plaintiffs and Settlement Class Representatives William Paetzold and Laurie Paetzold spent significant personal time and effort in prosecuting this litigation. They each sat for deposition conducted by Defendant’s counsel, and also have produced documents and responded to interrogatories in response to Defendant’s discovery requests. They have also remained closely involved both in monitoring and supervising the conduct of this case.


Seth R. Klein

COUNTY OF HARTFORD)
) ss. West Hartford, Connecticut
STATE OF CONNECTICUT)

Subscribed and sworn to before me this 29th day of July, 2020.


Oren Faircloth
Commissioner of the Superior Court

CERTIFICATION

I certify that on this 29th day of July, 2020, a copy of the foregoing was sent by email to all counsel of record as follows:

Wystan M. Ackerman
ROBINSON & COLE LLP
wackerman@rc.com

Kevin P. Daly
ROBINSON & COLE LLP
kdaly@rc.com

/s/ Seth R. Klein
Seth R. Klein

EXHIBIT 1



FIRM RESUME

Izard, Kindall & Raabe LLP (“IKR”)¹ is one of the premier firms engaged in class action litigation on behalf of consumers, investors and employees. In the consumer area, the Firm has served or is serving as lead counsel in cases involving a variety of industries including banking, *Mathena v. Webster Bank, N.A.*, Civil Action No. 3:10-cv-01448-SRU (D. Conn), *Farb v. Peoples United Bank*, UWY-CV11-6009779-S (Conn Sup. Ct); *Forgione v. Webster Bank, N.A.*, No. X10-UWY-CV-12-6015956-S (Conn. Sup. Ct.); wholesale milk pricing, *Ice Cream Liquidation, Inc. v. Land O’Lakes, Inc.*, No. 02-cv-0377 (D. Conn.); book printing and distribution, *Booklocker.com, Inc. v. Amazon.com*, 08-cv-00160-JAW (D. Me); gasoline distribution, *Wyatt Energy v. Motiva Enterprises, LLC*, X01 cv 02-0174090-S (Conn. Super Ct); and electricity supply contracts, *Chandler v. Discount Power*, No. X03-HHD-CV14-6055537 (Conn. Super. Ct.), *Edwards v. North American Power & Gas, LLC*, No. 3:14-cv-1714 (D. Conn.), *Gruber v. Starion Energy, Inc.*, No. 3:14-cv-01828 (D. Conn.), *Jurich v. Verde Energy, USA, Inc.*, No. HHD-cv-156060160 (Conn. Super. Ct.), *Sanborn v. Viridian Energy, Inc.*, No. 3:14-cv-01731 (D. Conn.), and *Steketee v. Viridian Energy, Inc.*, No. 3:15-cv-00585.

IKR is representing, or has represented, purchasers of a variety of consumer products in unfair trade practice cases, including *Langan v. Johnson & Johnson Consumer Companies, Inc.*,

¹ Formerly known as Izard Nobel LLP, Schatz Nobel Izard, P.C., and Schatz & Nobel, P.C.

Nos. 13-cv-01470 (D. Conn.), *Morales v. Conopco Inc., d/b/a Unilever*, No. 2:13-cv-2213 (ED Cal.), and *Balser v. The Hain Celestial Group, Inc.*, No. 13-cv-5604 (C.D. Cal.). The Firm's successful consumer practice is informed by our lawyers' work prior to joining IKR. Robert Izard represented an insurer in price-fixing litigation in various state courts and one federal court around the United States, while Seth Klein worked for the consumer protection department of the Connecticut Attorney General's Office.

Our practice is also built upon the Firm's decades of experience in class action litigation where we have frequently served as lead or co-lead counsel, including:

- *Papanikolaou v. Value-Added Communications*, No. 3-95CV0346-H (N.D. Tex.);
- *Gorga v. Uniroyal Chemical Corp.*, No. CV-96-0132014-S (Conn. Super.);
- *David v. Simware, Inc.*, No. 96/602143 (N.Y. Sup.);
- *Butler v. Northstar Health Services, Inc.*, No. 96-701 (W.D. Pa.);
- *Allen v. Johansson*, No. 397CV02172 (RNC) (D. Conn.);
- *Feiner v. SS&C Techs.*, No. 397CV0656 (D. Conn.);
- *Berti v. Videolan Techs, Inc.*, No.3:97CV296H (W.D. Ky.);
- *Ganino v. Citizens Utilities Co.*, No. 398CV00480 (JBA) (D. Conn.);
- *Bunting v. HealthCor Holdings, Inc.*, No. 398CV0744-D (N.D. Tex.);
- *Hirsch v. PSS World Medical, Inc.*, No. 98 502 Civ. J20A (M.D. Fla.);
- *Kenneth Blau v. Douglas Murphy*, No. H 99 0535 (S.D. Tex.);
- *Angres v. Smallworldwide plc*, No. 99-K-1254 (D. Colo.);
- *In re Complete Mgmt., Inc. Sec. Litig.*, No. 99 Civ. 1454 (S.D.N.Y.);
- *Allain Roy v. dELiA's, Inc.*, No. 99 Civ. 3951 (JES) (S.D.N.Y.);
- *Russo v. KTI, Inc.*, No. 99-1780 (JAG) (D.N.J.);

- *Laborers Local 1298 Pension Fund v. Campbell Soup Co.*, No. 00-152 (JEI) (D.N.J.);
- *Hart v. Intern, thet Wire*, No. 00 Civ. 6571 (S.D.N.Y.);
- *Ottmann v. Hanger Orthopedic Group, Inc.*, No. AW 00CV3508 (D. Md.);
- *In re PolyMedica Corp. Sec. Litig.*, No. 00-12426-REK (D. Mass.);
- *Karl L. Kapps v. Torch Offshore, Inc.*, No. 02-CV-0582 (E.D. La);
- *In re Cable and Wireless, PLC, Sec. Litig.*, No. 02-1860 (E.D. Va);
- *In re Alloy, Inc. Sec. Litig.*, Case No. 03-CV-1597 (S.D.N.Y.);
- *In re Surebeam Corporation Sec. Litig.*, No. 03-CV-1721 (S.D. Cal.);
- *In re Primus Telecoms. Group, Inc. Sec. Litig.*, Master Case No. 04-970-A (E.D. Va.);
- *In re Netopia Sec. Litig.*, Case No. C 04-3364 (N.D. Cal);
- *Malasky v. IAC/InterActive Corp.*, Case No. 04-CV-7447 (S.D.N.Y.);
- *In re Supportsoft, Inc. Sec. Litig.*, No. C 04-5222 SI (N.D. Cal.);
- *Berson v. Applied Signal Tech. Inc.*, No. 4:05-cv-01027-SBA (N.D. Cal.);
- *The Cornelia I. Crowell GST Trust v. Pemstar, Inc.*, No. 05-CV-1182 (D. MN);
- *UFCW Local 880 Retail Food Employers Joint Pension Fund v. Newmont Mining Corp.*, No. 05-CV-01046 (D. Colo.);
- *Aviva Partners v. Exide Techs.*, No. 3:05-CV-03098 (D. NJ);
- *In re Veritas Software Corp. Sec. Litig.*, No. 04-831 (D. Del.);
- *In re Ionatron, Inc. Sec. Litig.*, No. 06-354 (D. AZ);
- *In re FX Energy, Inc. Sec. Litig.*, No. 2:07-CV-00874 (D. UT);
- *In re First Virtual Communications, Inc. Sec. Litig.*, No. C-04-3585MJJ (N.D. Cal.);
- *Melms v. Home Solutions of America*, No. 3:07-CV-1961-N (N.D. Tex.);
- *In re: McDermott Int'l, Inc. Sec. Litig.*, No. 1:08-cv-09943-DC (S.D.N.Y 2008);
- *Desai v. Bucksbaum*, No. 09-CV-487 (N.D. IL.);

- *Bauer v. Prudential, Inc.*, No. 09-cv-1120 (JLL) (D.NJ);
- *Klugmann v. American Capital Ltd.*, No. 09-CV-0005 (D. Md.);
- *Overby v. Tyco Int'l, Ltd.*, No. 02-CV-1357-B (D.N.H.);
- *In re Reliant Energy ERISA Litig.*, No. H-02-2051 (S.D. Tex.);
- *In re AOL Time Warner, Inc. Sec. and ERISA Litig.*, MDL Docket No. 1500 (S.D.N.Y.);
- *Furstenau v. AT&T*, Case No. 02 CV 8853 (D.N.J.);
- *In re AEP ERISA Litig.*, Case No. C2-03-67 (S.D. Ohio);
- *In re JDS Uniphase Corp. ERISA Litig.*, Civil Action No. 03-4743-CW (N.D. Cal.);
- *In re Sprint Corporation ERISA Litig.*, Master File No. 2:03-CV-02202-JWL (D. Kan.);
- *In re Cardinal Health, Inc. ERISA Litig.*, Case No. C 2-04-642 (S.D. Ohio);
- *Spear v. Hartford Fin. Svcs Group. Inc.*, No. 04-1790 (D. Conn.);
- *In re Merck & Co., Inc. Sec., Derivative and ERISA Litig.*, MDL No. 1658 (D.N.J.);
- *In re Diebold ERISA Litig.* No. 5:06-CV- 0170 (N.D. Ohio);
- *In re Bausch & Lomb, Inc. ERISA Litig.*, Master File No. 06-CV-6297-MAT-MWP (W.D.N.Y.);
- *In re Hartford Fin. Svcs Group. Inc. ERISA Litig.*, No. 08-1708 (D. Conn.);
- *In re Merck & Co., Inc. Vytorin ERISA Litig.*, MDL No. 1938, 05-CV-1974 (D.N.J.);
- *Mayer v. Administrative Committee of Smurfit Stone Container Corp.*, 09-CV-2984 (N.D. IL.);
- *In re YRC Worldwide ERISA Litig.*, Case No. 09-CV-02593 (D. Kan);
- *Board of Trustees v. JP Morgan Chase Bank*, Case No. 09-cv-9333 (S.D.N.Y.);
- *White v. Marshall & Ilsley Corp.*, No. 10-CV-00311 (E.D. Wis.);
- *Griffin v. Flagstar Bancorp, Inc.*, No. 2:10-CV-10610 (E.D. Mich.);
- *In re Eastman Kodak ERISA Litig.*, Master File No. 6:12-cv-06051-DGL (W.D.N.Y.);

- *Kemp-DeLisser v. Saint Francis Hospital and Medical Center*, Civil Action No. 3:15-cv-01113-VAB (D. Conn.);
- *Tucker v. Baptist Health System, Inc.*, Case No. 2:15-cv-00382-SLB (N.D.AL.);
- *Cryer v. Franklin Resources, Inc.*, No. 4:16-cv-04265 (N.D. Cal.);
- *Matthews v. Reliance Trust Company*, No. 1:16-cv-04773 (N.D. Ill.);
- *Brace v. Methodist Le Bonheur Healthcare*, No. 16-cv-2412-SHL-tmp (W.D. Tenn.);
- *Nicholson v. Franciscan Missionaries of our Lady Health Systems*, No. 16-CV-258-SDD-EWD (M.D. LA);
- *In re Mercy Health ERISA Litig.*, No. a:16-cv-441 (S.D. Ohio);
- *Negron v. Cigna Corp.*, No. 3:16-cv-01702 (D. Conn.);
- *Berry v. Wells Fargo & Co.*, No. 3:17-304 (D.S.C.); and
- *Neufeld v. Cigna Health & Life Ins.*, No. 3:17-cv-01693 (D. Conn.).

Our notable successes include settlements against the Franciscan Missionaries of Our Lady Health System (\$125 million), Saint Francis Hospital & Medical Center (\$107 million), AOL Time Warner (\$100 million); Tyco International (\$70.5 million); Merck (\$49.5 million); Cardinal Health (\$40 million); and AT&T (\$29 million). Moreover, IKR was on the Executive Committee in *In re Enron Corporation Securities and ERISA Litig.*, No. 02-13624 (S.D. Tex.), which resulted in a recovery in excess of \$250 million. In *Morales v. Conopco Inc., d/b/a Unilever*, the Court noted that the Settlement IKR negotiated achieved the “key goal” of discontinuing sales of the challenged products under the “naturals” label as well as providing Class Members with damages that were “greater than the economic damages suffered per product purchased.” *Morales v. Conopco, Inc.*, No. 2:13-2213 WBS EFB, 2016 WL 6094504, at *6 (E.D. Cal. Oct. 18, 2016).

IKR's successful prosecution of class actions has been recognized and commended by judges in numerous judicial districts. In the *Tyco ERISA* litigation, Judge Barbadoro commented:

I have absolutely no doubt here that the settlement is fair, reasonable and adequate. I think, frankly, it's an extraordinary settlement given the circumstances of the case and the knowledge that I have about the risks that the plaintiff class faced in pursuing this matter to verdict [I]t was a very, very hard fight and they made you work for everything you obtained on behalf of the Class here....

I have a high regard for you. I know you to be a highly experienced ERISA class action lawyer. You've represented your clients aggressively, appropriately and effectively in this litigation, and I have a high degree of confidence in you so I don't think there's any question that the quality of counsel here is a factor that favor's the Court's endorsement of the proposed settlement. . . .

I have enjoyed working with you in this case. You've always been helpful. You've been a gentleman. You've been patient when I've been working on other matters. .

In re Tyco Int'l Ltd. Sec. Litig., Case No. 02-1335 (D.N.H. Nov. 18, 2009). Similarly, in approving the Sprint ERISA settlement, Judge Lungstrum found, "[t]he high quality of [IKR's] work culminated in the successful resolution of this complex case" and that "the results obtained by virtue of the settlement are extraordinary. . . ." *In re Sprint Corp. ERISA Litig.*, No. 03-2202 (D. Kan. Aug. 3, 2006). A Special Master appointed in the AOL Time Warner ERISA case commented that obtaining an additional \$30 million for the class stood out as "some of the hardest work and most outstanding results" obtained by IKR and its co-counsel. *In re AOL Time Warner, Inc. Sec. and ERISA Litig.*, No. 02-CV-1500 (S.D.N.Y.), Report & Recommendation of Special Master dated August 7, 2007. The District Court's decision approving the settlement negotiated by IKR in the St. Francis litigation similarly found the result to be "an extremely favorable one for the class," noting that the recovery achieved by the settlement represented over 76 percent of the

amount by which the retirement plan was alleged to be underfunded. *Kemp-DeLisser v. Saint Francis Hosp. & Med. Ctr.*, No. 15-CV-1113 (VAB), 2016 WL 6542707, at *10 (D. Conn. Nov. 3, 2016). The Court also noted that IKR's time and efforts "resulted in an extremely efficient and favorable resolution of the case." *Id.* at *5.

ATTORNEYS

Robert A. Izard heads the firm's ERISA team and is lead or co-lead counsel in many of the nation's most significant ERISA class actions, including cases against Merck, Tyco International, Time Warner, AT&T and Sprint among others. Mr. Izard has substantial experience in other types of complex class action and commercial litigation matters. For example, he represented a class of milk purchasers in a price fixing case. He also represented a large gasoline terminal in a gasoline distribution monopolization lawsuit.

As part of his twenty plus years litigating complex commercial cases, Mr. Izard has substantial jury and nonjury trial experience, including a seven-month jury trial in federal district court. He is also experienced in various forms of alternative dispute resolution, including mediation and arbitration, and is a Distinguished Neutral for the CPR Institute for Dispute Resolution.

Mr. Izard is the author of *Lawyers and Lawsuits: A Guide to Litigation* published by Simon and Schuster and a contributing author to the *Mediation Practice Guide*. He is the former chair of the Commercial and Business Litigation Committee of the Litigation Section of the American Bar Association.

Mr. Izard received his B.A. from Yale University and his J.D., with honors, from Emory University, where he was elected to the Order of the Coif and was an editor of the Emory Law Journal.

Mark P. Kindall joined the firm in 2005. Since joining the firm, he has represented clients in many significant class action cases, including ERISA litigation against AOL Time Warner, Kodak and Cardinal Health, consumer fraud cases against Johnson & Johnson and Unilever, securities fraud litigation against SupportSoft, American Capital and Nuvelo, bank overdraft fee litigation against Webster Bank and People's United Bank, and antitrust litigation involving manufacturers of Korean Ramen Noodles. Mr. Kindall successfully argued *Berson v. Applied Signal Tech. Inc.*, 527 F.3d 982 (9th Cir. 2008), and *Balser v. The Hain Celestial Group*, No. 14–55074, 2016 WL 696507 (9th Cir. 2016), which clarified standards for victims of securities and consumer fraud, respectively, as well as *Langan v. Johnson & Johnson Consumer Cos., Inc.*, 897 F.3d 88 (2d Cir. 2018), which held that plaintiffs bringing claims under state law could represent a class that included people in states with similar laws.

Mr. Kindall was a lawyer at Covington & Burling in Washington, D.C. from 1988 until 1990. In 1990 he joined the United States Environmental Protection Agency as an Attorney Advisor. He represented the U.S. government in international negotiations at the United Nations, the Organization for Economic Cooperation and Development and the predecessor of the World Trade Organization, and was a member of the U.S. Delegation to the United Nations Conference on Environment and Development (the "Earth Summit") in Rio de Janeiro in 1992. From 1994 until 2005, Mr. Kindall was an Assistant Attorney General for the State of Connecticut, serving as lead counsel in numerous cases in federal and state court and arguing

appeals before the Connecticut Supreme Court and the United States Court of Appeals for the Second Circuit.

Mr. Kindall has taught courses in appellate advocacy, administrative law and international environmental law at the University of Connecticut School of Law. He is admitted to practice in Connecticut, California, and the District of Columbia. He is also a member of the bar of the United States Supreme Court, the U.S. Courts of Appeals for the Second, Fourth, Fifth, Ninth, and D.C. Circuits, and the United States District Courts for Connecticut, the District of Columbia, the Eastern District of Wisconsin, the Central District of Illinois, and all District Courts in New York and California.

Mr. Kindall is a 1988 graduate of the University of California at Berkeley Law School, where he served as Book Review Editor of the California Law Review and was elected to the Order of the Coif. He has a bachelor's degree in history with highest honors from the University of California at Riverside, and he also studied history at the University of St. Andrews in Scotland.

Craig A. Raabe joined the partnership in 2016 from a large, regional law firm, where he previously served as the chair of the litigation department. Mr. Raabe has tried many complex civil and criminal cases. He is a Fellow in the American College of Trial Lawyers. He has been listed in The Best Lawyers in America® in the areas of Commercial Litigation and Criminal Defense since 2006 (Copyright 2014 by Woodward/White, Inc., Aiken, SC). Mr. Raabe's commercial trial experience is broad and includes areas such as antitrust, government contracting, fraud, intellectual property, and unfair trade practices. He also has tried many serious felony criminal cases in state and federal court and is active in the criminal defense trial

bar. In addition to his trial practice, Mr. Raabe counsels clients on compliance issues and the resolution of regulatory enforcement actions by government agencies.

By appointment of the chief judge of the Second Circuit, Mr. Raabe has served on the Reappointment Committee for Connecticut's federal defender, and the chief judge of the Connecticut district court appointed him to chair the United States Magistrate Reappointment Committee in Connecticut. In 2012, the Connecticut district court judges selected Mr. Raabe for the district's Pro Bono Award for his service to indigent clients. In addition, he is listed as one of the Top 50 Lawyers in Connecticut by Super Lawyers® 2012 (Super Lawyers is a registered trademark of Key Professional Media, Inc.).

Mr. Raabe is admitted to practice in the U.S. Supreme Court, the Courts of Appeals for the First, Second, and D.C. Circuits, the U.S. District Courts for Connecticut and the Eastern and Southern Districts of New York, the U.S. Tax Court and the state of Connecticut. He is an honors graduate of Valparaiso University and Western New England College of Law, where he served as Editor-in-Chief of the Law Review. Following graduation, Mr. Raabe served as the law clerk for the Honorable Arthur H. Healey of the Connecticut Supreme Court.

Mr. Raabe is a commercial, instrument-rated pilot and is active in general aviation. He serves as a volunteer pilot for Angel Flight Northeast, which provides free air transportation to people requiring serious medical care.

Seth R. Klein graduated *cum laude* from both Yale University and, in 1996, from the University of Michigan Law School, where he was a member of the Michigan Law Review and the Moot Court Board and where he was elected to the Order of the Coif. After clerking for the Hon. David M. Borden of the Connecticut Supreme Court, Mr. Klein served as an Assistant

Attorney General for the State of Connecticut, where he specialized in consumer protection matters and was a founding member of the office's electronic commerce unit. Mr. Klein thereafter joined the reinsurance litigation group at Cadwalader, Wickersham & Taft LLP in New York, where he focused on complex business disputes routinely involving hundreds of millions of dollars. At IKR, Mr. Klein's practice continues to focus on consumer protection matters as well as on complex securities and antitrust litigation.

Douglas P. Needham received his Bachelor of Science degree from Cornell University in 2004 and his Juris Doctorate from Boston University School of Law in 2007. At Boston University, Mr. Needham was the recipient of a merit scholarship for academic achievement and a member of the school's Moot Court Team. Mr. Needham practiced law for six years in Syracuse, New York, devoting his practice to trial and appellate litigation in state and federal court. He moved to Connecticut in May of 2013 to join LeClair Ryan, A Professional Corporation, and became a partner at that firm in 2014. At LeClair Ryan, Mr. Needham prosecuted and defended a variety of business tort claims, including many for breach of fiduciary duty and fraud, in Connecticut, New York and Massachusetts.

Mr. Needham joined IKR in 2016. His practice focuses on fiduciary litigation under ERISA as well as consumer protection and fraudulent business practices.

Christopher M. Barrett has been an integral member of litigation teams responsible for securing monetary recoveries on behalf of plaintiffs that collectively exceed \$150 million. In 2015, he was selected by Super Lawyers magazine as a Rising Star. Super Lawyers Rising Stars recognizes top up-and-coming attorneys who are 40 years old or younger, or who have been practicing for 10 years or less.

Prior to joining the Firm, Mr. Barrett was associated with Robbins Geller Rudman & Dowd, where his practice focused on prosecuting class actions on behalf of plaintiffs, and Mayer Brown, where his practice focused on complex commercial litigation.

Mr. Barrett received his J.D., magna cum laude, from Fordham University School of Law where he served as a member of the Fordham Law Review, and was inducted into the Order of the Coif and the honor society Alpha Sigma Nu. For his work in the law school's law clinic, he was awarded the Archibald R. Murray Public Service Award. He earned his B.S. in Finance from Long Island University. During law school, Mr. Barrett served as a judicial intern to two United States District Judges (S.D.N.Y. and E.D.N.Y.) and a New York Supreme Court Justice. Mr. Faircloth graduated from McGill University in 2009 with a Bachelor of Arts degree in Political Science and a concentration in International Relations. Before attending law school, he served in the armed forces from 2010 to 2011.

Oren Faircloth graduated from McGill University in 2009 with a Bachelor of Arts degree in Political Science and a concentration in International Relations. Before attending law school, he served in the armed forces from 2010 to 2011.

Mr. Faircloth graduated from Quinnipiac University School of Law, magna cum laude, in 2016, where he received awards for Outstanding Performance in Oral Advocacy and for Excellence in Written Advocacy. During law school, Mr. Faircloth was a member of the Tax Law Society, the Quinnipiac Moot Court Society, and the Quinnipiac Law Review. Shortly after graduating, his note on Mediation and End of Life Futility Decisions for Newborns was published. Mr. Faircloth was admitted to the Connecticut state bar in 2016 and the United States District Court for Connecticut in 2018.

Prior to joining IKR, Mr. Faircloth worked for a regional insurance defense firm where his practice focused on construction, premises liability, and motor vehicle tort actions. Mr. Faircloth joined IKR in 2018. His practice focuses on ERISA and consumer protection actions.